

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD AUGUST 1, 2023 THROUGH AUGUST 11, 2023**

Debtor: LTL Management LLC

Applicant: Bates White, LLC

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition Date")

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**SECTION 1  
FEE SUMMARY**

Interim Fee Application No. \_\_\_\_\_ or  Final Fee Application

Summary of Amounts Requested for the Period from August 1, 2023 through August 11, 2023 (the "Third Statement Period").

Total Fees – LTL Bankruptcy:		\$162,161.00
Total Fees – Imerys Bankruptcy (50% of total):	+	\$0.00
Total Fees:		\$162,161.00
Total Disbursements:	+	\$39.49
Total Fees Plus Disbursements:		\$162,200.49
Minus 20% Holdback of Fees:	-	\$32,432.20
Amount Sought at this Time:		\$129,768.29

	<u>FEES</u>	<u>EXPENSES</u>	<u>TOTAL</u>
Total Previous Fees Requested:	\$2,992,264.75	\$2,274.64	\$2,994,539.39
Total Fees Allowed to Date:	\$0.00	\$0.00	\$0.00
Total Retainer (If Applicable):	\$0.00 <sup>1</sup>	N/A	\$0.00
Total Holdback (If Applicable):	\$598,452.95	\$0.00	\$598,452.95
Total Received by Applicant:	\$447,831.40	\$0.00	\$447,831.40

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<sup>1</sup> Consistent with paragraph 2(g) of the Interim Compensation Order, Bates White has drawn its requested 80% of fees in its Second Monthly Fee Statement from the payment Bates White received from LTL prior to this bankruptcy filing. The amount of Bates White's Second Monthly Fee Statement exhausted the balance of \$347,805.00 reported previously.

**Summary by timekeeper included in this Fee Application – LTL Bankruptcy**

Name of Professional	Title <sup>2</sup>	Rate	Hours	Fees
Chandler, Kathleen	Partner	\$825	4.7	\$3,877.50
Evans, Andrew	Partner	\$1,000	6.6	\$6,600.00
Lobel, Scott	Partner	\$875	5.0	\$4,375.00
Mullin, Charles	Partner	\$1,375	4.3	\$5,912.50
Scher, Benjamin	Partner	\$1,000	3.9	\$3,900.00
Kennedy, Pauline	Principal	\$800	0.5	\$400.00
Peters, Sarah	Managing Consultant	\$675	32.4	\$21,870.00
Lin, Dajun	Senior Economist	\$550	19.9	\$10,945.00
Odio-Zuniga, Mariana	Senior Economist	\$550	27.4	\$15,070.00
Malkov, Egor	Economist	\$525	12.1	\$6,352.50
Coleman, Nathan	Senior Consultant	\$480	8.7	\$4,176.00
Habiger, Conor	Senior Consultant	\$500	16.5	\$8,250.00
Stewart, Samantha	Senior Consultant	\$520	8.8	\$4,576.00
Post, Douglas	Data Engineer II	\$500	2.5	\$1,250.00
McBride, Hannah	Consultant II	\$425	35.1	\$14,917.50
Morey, Austin	Consultant II	\$435	4.6	\$2,001.00
Swope, Madison	Consultant II	\$435	8.8	\$3,828.00
Villani, Joseph	Consultant II	\$425	62.2	\$26,435.00
Newcomb, Benjamin	Consultant	\$395	34.6	\$13,667.00
Downey, Marguerite	Project Coordinator	\$280	0.6	\$168.00
Slom, Sam	Project Coordinator	\$230	15.0	\$3,450.00
Jain, Mahima	Data Specialist	\$280	0.5	\$140.00
<b>TOTAL</b>			<b>314.7</b>	<b>\$162,161.00</b>

**Summary by timekeeper included in this Fee Application – Imerys Bankruptcy**

Name of Professional	Title	Rate	Hours	Fees
N/A			N/A	N/A
<b>TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>
<b>50% OF TOTAL</b>			<b>0.0</b>	<b>\$0.00</b>

<sup>2</sup> As described in Dkt. 1006, the standard hourly rates for the timekeepers listed below were adjusted effective August 1, 2023 to reflect their promotions:

- Mariana Odio-Zuniga was promoted from Economist to Senior Economist;
- Nathan Coleman was promoted from Consultant II to Senior Consultant;
- Hannah McBride was promoted from Consultant to Consultant II; and
- Joseph Villani was promoted from Consultant to Consultant II.

**SECTION II**  
**SUMMARY OF SERVICES**

<b>SERVICES RENDERED – LTL BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
Analysis	149.2	\$82,423.50
Client Communication	8.1	\$6,055.00
Data Analysis	38.6	\$16,512.00
Data Gathering & Processing	63.7	\$26,467.50
Fee Request Preparation	42.3	\$22,213.50
Project Management	12.8	\$8,489.50
<b>SERVICES TOTAL</b>	<b>314.7</b>	<b>\$162,161.00</b>

<b>SERVICES RENDERED – IMERYS BANKRUPTCY</b>	<b>HOURS</b>	<b>FEES</b>
N/A	N/A	N/A
<b>SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>
<b>50% OF SERVICES TOTAL</b>	<b>0.0</b>	<b>\$0.00</b>

**SECTION III**  
**SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENT TYPE – LTL BANKRUTPCY</b>	<b>AMOUNT</b>
Billable Travel	\$39.49
<b>DISBURSEMENTS TOTAL</b>	<b>\$39.49</b>

<b>DISBURSEMENT TYPE – IMERYS BANKRUTPCY</b>	<b>AMOUNT</b>
N/A	N/A
<b>DISBURSEMENTS TOTAL</b>	<b>\$0.00</b>

## SECTION IV CASE HISTORY

1. Case Filed: April 4, 2023 (the “Petition Date”)
2. Chapter under which case commenced: Chapter 11
3. Date of Retention: June 7, 2023, effective as of the Petition Date [Dkt. 723] (the “Retention Order”).<sup>3</sup>
4. Summary explaining the nature of the work performed and the results achieved:<sup>4</sup>

During the Third Statement Period, Bates White provided the following services including, but not limited to:

- Assessing workplan with counsel given case status.
- Continuing to develop analysis of current and future claims.
- Reviewing and analyzing data related to talc claims.
- Compiling fee materials and preparing Second Monthly Fee Statement.

I certify under penalty of perjury that the above is true.

Dated: September 7, 2023  
Washington, DC

Respectfully submitted,

/s/ Scott M. Lobel  
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TALC CONSULTANTS FOR DEBTOR

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<sup>3</sup> The Retention Order is attached hereto as Exhibit B.

<sup>4</sup> The invoice detail and expense detail submitted hereto as Exhibit C and Exhibit D, respectively, includes detailed time entries and expense entries summarizing the professional services rendered by Bates White, LLC as talc consultants to the Debtor in the LTL Bankruptcy.